

## **APPENDIX A**

### **SELECTIONS FROM PLAN OF OPERATION OIL SHALE TEST PROJECT**

***[[SELECTIONS FROM]]***

**Plan of Operations**

**Shell Frontier Oil and Gas Inc.**

**Oil Shale Test Project**

***Oil Shale Research and  
Development Project***

**Prepared for:  
Bureau of Land Management**

**February 15, 2006**



## **4.0 OPERATING PLAN**

### **4.1 General Project Overview and Summary**

The Oil Shale Test Project (OST) is a research, development, and demonstration project designed to demonstrate the In Situ Conversion Process (ICP), gather additional operating data and information, and allow testing of components and systems to demonstrate the commercial feasibility of recovering hydrocarbons from oil shale. This plan details the construction, operation, and reclamation of the OST and the supporting facilities.

The ICP is an in situ process using electric heaters to heat the oil shale in place. The heating process pyrolyzes the organic matter in the oil shale and converts this matter into oil and hydrocarbon gas. The oil and gas are then removed from the ground using conventional oil field pumping and extraction technology and processed using conventional oil and gas processing. The recovery is conducted within a contained area to allow recovery of the hydrocarbons while excluding ground water flow through the oil production area. Containment is provided in a freeze wall containment area consisting of a freeze wall system and low permeability barrier above and below the oil shale resource zone. These are described below.

Since the ICP for the OST is planned for use in areas below the ground water table, a freeze wall containment area is created to isolate the ICP from the surrounding ground water. Freezing of the in situ ground water and associated rock matrix creates a containment barrier that prevents migration of fluids into or out of the ICP area. The freeze wall is constructed by drilling closely spaced holes outside the intended oil shale resource target zone and circulating chilled refrigerant through closed loop piping in each freeze wall hole. Through heat exchange with the surrounding rock matrix, the refrigerant returns to the surface warmer than its inflow temperature and the surrounding rock and associated pore and fracture water is cooled and frozen. This frozen barrier is formed along the entire depth of the freeze hole and continues to grow and thicken until the area between freeze holes is frozen, forming a continuous frozen wall-like barrier that extends through the resource zone and into the impermeable layer at the bottom, thus forming a containment area that confines the ICP. The freeze wall containment area is maintained through heating and product recovery as well as during ground water reclamation.

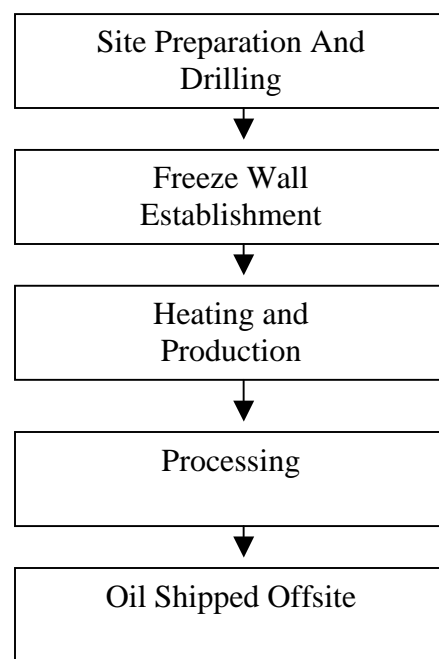
Once the freeze wall is established, a series of dewatering holes are drilled in the interior of the freeze wall containment area to allow recovery of the hydrocarbon products. Initially these ten holes will be used to remove ground water inside the freeze wall containment area prior to heating. The holes will later be converted to producer holes that will remove the hydrocarbon products. Water from dewatering the freeze wall containment area will be re-injected outside the

freeze wall into the appropriate water-bearing zones so that existing water quality is not impacted. Dewatering and reinjection flow rates will be monitored to allow calculation of the amount of water taken from the containment area. Removal of the ground water prior to heating will prevent mixing of the hydrocarbons and ground water. Dewatering will not result in removal of all of the ground water within the containment area as some pore water cannot be removed through pumping during dewatering.

A series of heater holes are also drilled within the freeze wall containment area. Heaters are installed in these holes to allow heating of the resource interval. The heater holes are placed such that an unheated zone of approximately 125 feet is maintained between the freeze wall barrier and the heated zone so that the freeze wall is not impacted by heating. The heaters raise the temperature of the oil shale and initiate pyrolysis, releasing hydrocarbon products that are then removed using the production holes.

Products from the pyrolyzed zone are piped to an on-site processing facility, where processing separates the oil, gas, and water. Oil is processed to remove impurities, then shipped off site to existing refineries for refining. Gas from the production holes is also treated and used to supplement energy needs at the site or incinerated as quantities are not sufficient to justify facilities necessary for commercial transportation and sale. Sulfur, produced as a product during processing, is transported off-site as a marketable product. Figure 4.1 shows a simplified diagram describing the steps included in the OST ICP.

After removal of the recoverable product from the oil shale deposit, the area within the freeze wall containment area contains residual pyrolysis products. These are removed through rinsing prior to allowing the freeze wall barrier to thaw. The water used for rinsing is treated in an on-site ground water reclamation treatment plant, then recycled as rinse water. Waste from the ground water reclamation treatment plant is hauled off site. Reject brine solution from the ground water reclamation treatment plant is disposed in the evaporation pond. When the area is sufficiently rinsed and the collected rinse water meets appropriate quality, the freeze wall barrier is then allowed to thaw.



**Figure 4.1 Diagram of OST ICP**

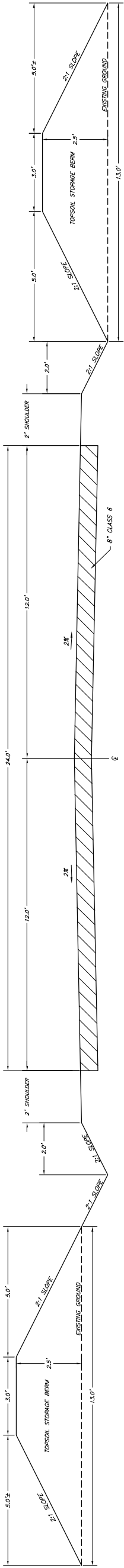
As a part of reclamation, the wells and holes not needed for monitoring are plugged and abandoned in accordance with requirements of the Colorado Office of the State Engineer. Facilities will be demolished and removed and the site will be regraded and revegetated. The paved access road will also be reclaimed, leaving a dirt road access route. The reclamation plan (Section 5) provides details on reclamation of the ICP and of the site disturbance.

Support facilities include a site access road; construction and drilling support consisting of lay down yards, storage units and office trailers; portable pilot test plants, process control building, change house, utilities, warehouse, shop/ maintenance facilities, laboratory, and other facilities necessary to support the OST Project. Potable water will be trucked to the site and stored for use in the on site potable water system. The following sections contain detailed information on the various process components associated with the OST facility.

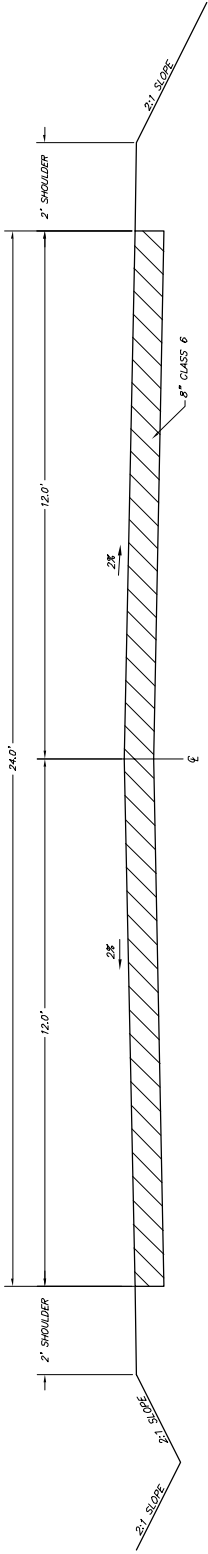
#### **4.2 General Site Development and Preparation**

Initial construction activities include development of the site access road and fencing of the permit area. The present access to the OST site is from County Road (CR) 5 to CR 24 to CR 91 to an existing two-track road (see Exhibit C). This two-track road was originally constructed to access several ground water hydrology monitoring well sites. The access road will be extended to the OST site and expanded to a running width of approximately 24 feet to allow heavy equipment travel in two directions. The access road will be paved with asphalt for the 24-foot width and include appropriate ditches and culverts to maintain drainage control. Soils salvaged during the road construction will be stored in berms located on either side of the road. Figure 4.2 provides additional information on the design of the access road. Access to the OST site from the road will be restricted through an entry gate.

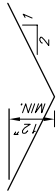
The OST project, excluding the access road, will be fenced with a combination barbed/smooth wire fence with the top wire being smooth. A 12-foot wide fire lane will be constructed along the permit boundary fence. Signs reading “Do Not Enter” will be posted at points of logical entrance to the facility, such as roads or trails, to redirect unauthorized personnel. Eight-foot high chain link fencing will be provided around lined ponds (storm water pond, process water pond, and evaporation pond) when these ponds are constructed.



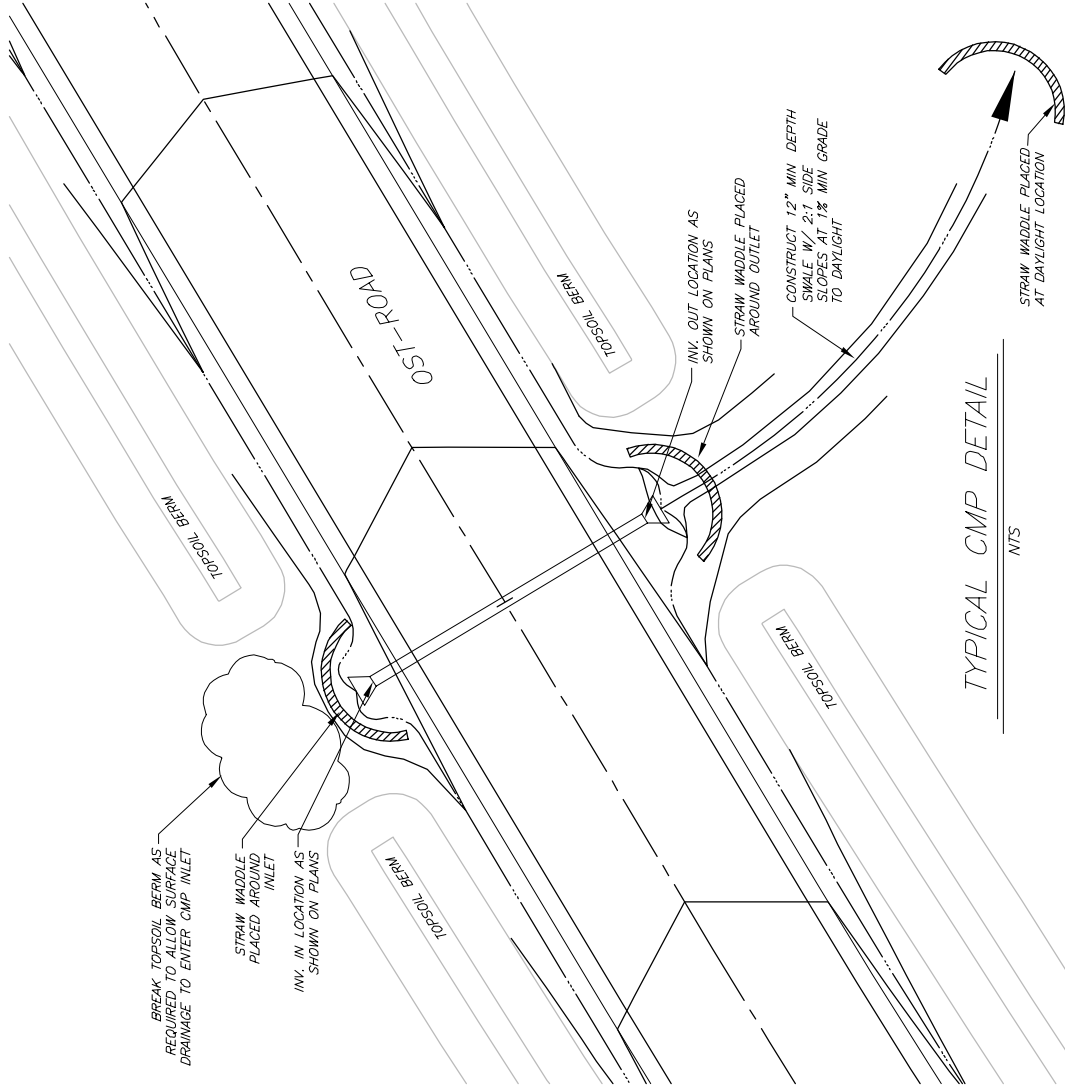
TYPICAL ROAD DETAIL (W/BERMS)



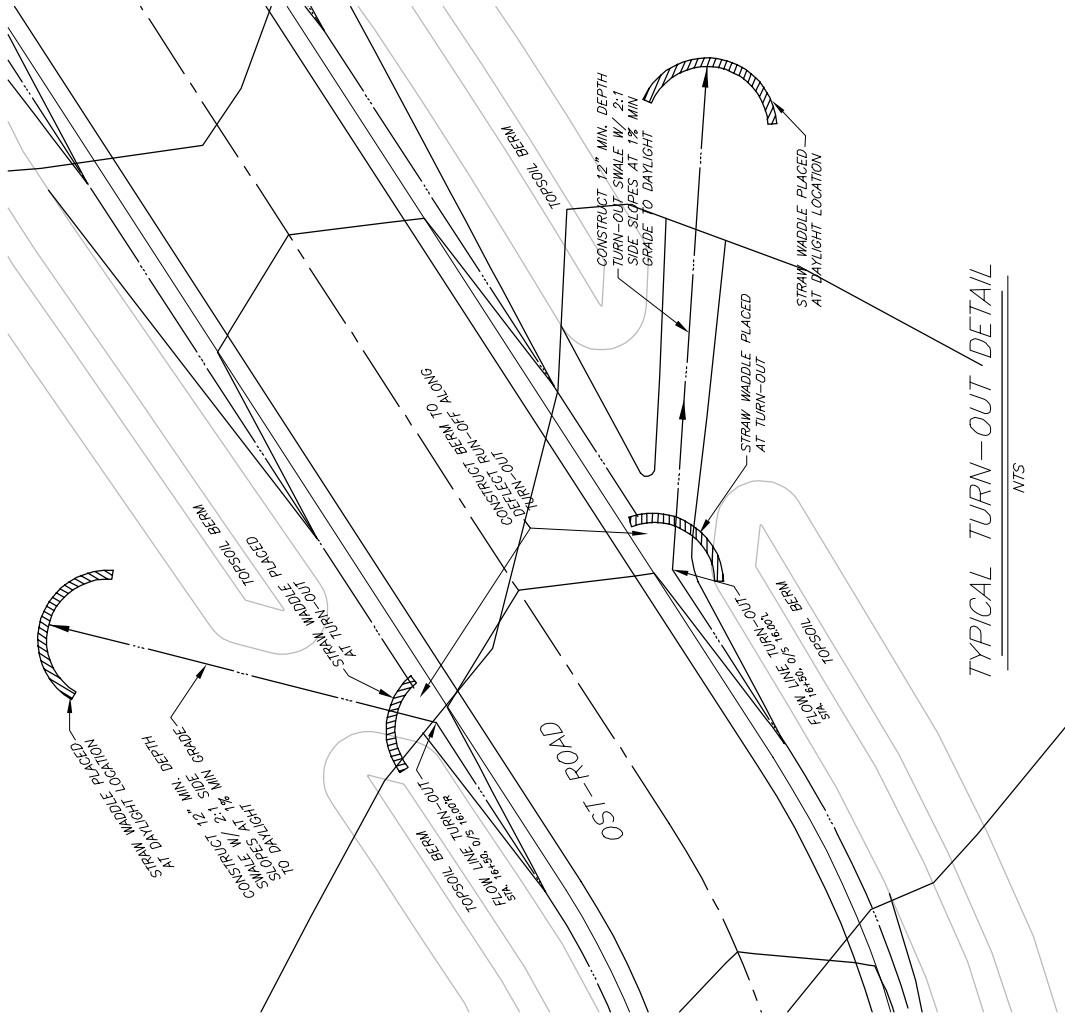
TYPICAL ROAD DETAIL



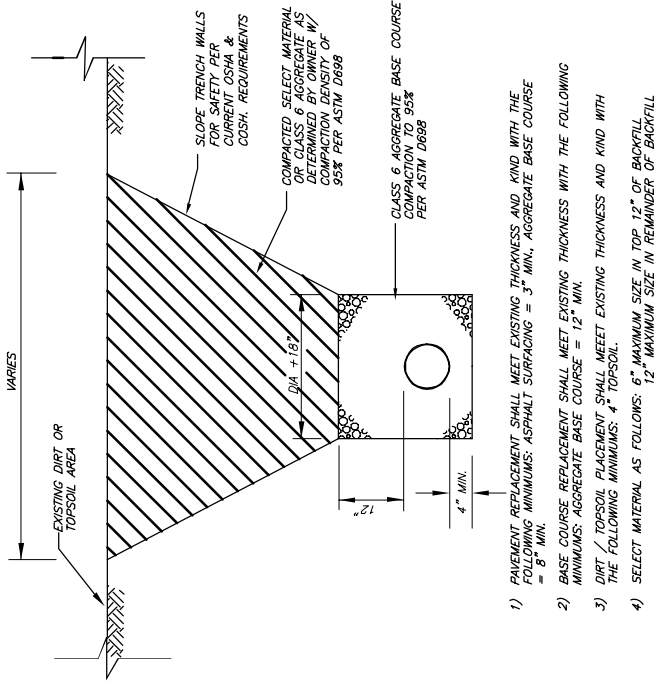
TYPICAL DRAINAGE SWALE



TYPICAL CMP DETAIL



TYPICAL TURN-OUT DETAIL



TRENCH CROSS SECTION

FIGURE 4.2

TYPICAL ACCESS ROAD DESIGN

## **Surface Drainage Controls**

A surface water drainage collection and conveyance system will be established to manage drainage throughout the site. The surface drainage control system along with the site grading will route storm water flows from the disturbed areas into a storm water pond prior to discharge to the existing surface drainage system. The surface drainage system consists of ditches, storm sewers, culverts, curbs, and paving. Ditches will be lined with riprap or other material where necessary to assure stability. The storm water pond has been designed with a retention capacity of approximate 15.3 acre-feet and will be constructed near the northwest corner of the property. The pond has been designed to retain the runoff and sediment from a 50-year, 24-hour storm event (2.5 inches). A conservative runoff factor of 0.9 was used, assuming 90 percent of the precipitation is directed into surface water control structures. The storm water pond will be lined with a single synthetic liner. The liner is not needed for storm water control, hence the pond may be constructed without the liner for use in collecting sediment during construction activities and the liner would be installed at a later date. Although not anticipated to be needed, the pond will be lined to provide the potential for additional lined containment should such containment be needed in the future. Exhibit M shows the drainage control plan.

Construction storm water drainage will be managed through a construction Storm Water Management Plan and the use of accepted Best Management Practices (BMP), in accordance with a construction storm water permit. During construction and during operations areas of light disturbance that do not report to the storm water pond will be managed using BMPs. Erosion control measures will include stabilization of exposed soils and protection of steep slopes. Exposed soils will be stabilized by mulching, seeding, soil roughening, or chemical stabilization. Steep slopes will be protected by use of geotextiles, temporary slope drains, mulch, or seeding. Sediment controls may include sediment basins rock dams, sediment filters such as filter cloth, hay bales, erosion blankets, temporary seeding.

## **Site Preparation**

The OST site will be terraced to provide five levels (support facilities, production, processing, storage tanks, and shipping). Exhibit J is a plot plan that shows the locations for all facilities at OST. Exhibit K contains several cross sections through the OST site showing the operating levels and associated facilities.

The support facilities level will contain the warehouse, shop building, laboratory, potable water tank and delivery system, and security. The production level will contain the freeze wall, heaters, production gathering system, and water reclamation facility. The process level will contain the process building, sulfur loading facility, refrigeration unit, refrigerant unloading facility, utility



buildings, and electrical substations. The storage tank level contains tank storage and associated containment for the Untreated Synthetic Condensate (USC) and storage for process watertreatment feed and effluent. The shipping level contains the process water treatment plant, product storage, truck loading and storm water pond. The process water pond and evaporation pond will be located northeast of the terraced areas. A partial list of equipment needed for the project is shown on Table 4.1.

**Table 4.1 Equipment List**

Air Blowers	Granular Activated Carbon Beds	Scrapers
Ammonia Circulation Pumps	H2S Stripper	Separator
Ammonia Stripper Accumulator	H2S Stripper Accumulator	Skimmings Concentrator
Ammonia Stripper Condensers	H2S Stripper Condenser	Slop Oil Equalization Tank and Pumps
Ammonia Strippers	H2S Stripper Inlet Preheat	Slops Pumps
Backhoes	High Pressure Nitrogen Storage Package	Solids Separation Clarifier
Backwash water Pumps	Influent Transfer Pumps	Solvent Stripper
Bio-solids Blower	Instrument Air package	Sour Water Stripper Cooler
Bio-solids Pump	Lean Sulfinol Heaters	Spent Carbon Feed Tanks
Biotreater Feed Cooler	Lo-cat Absorber	SRC Pumps
Biotreater Pumps	Lo-cat Oxidizer Vessel	Stabilizer Reboilers
Boiler Packages	Lo-cat Slurry Centriguge	Stand-by Generator
Bulldozers	Lo-cat solution Recirculation Tank	Stripper Effluent Coolers
Carbon Regeneration Furnace	MDEA Carbon Beds	Stripper Feed Pumps
Clarifier Sludge Transfer Pumps	MDEA Cooler	Sulfinol Pumps
Coalescing Filter	MDEA Exchanges	Sulfinol Reboilers
Combustion Products Accumulator	MDEA Pumps	Sulfur Pit
Combustion Products Condenser	Membrane Bio-reactor Unit	Sulfur Product Tank
Concrete Trucks	Nitrogen Storage and Vaporizer	Sulfur recovery unit Reaction Furnace
Condensate Pots	NO2 Gas Absorber	Sulfur Seal Pots
Condensate Pumps	NO2 Gas Compressor	Sulfur Slurry Pumps
Converter Heaters	NO2 Gas Condenser	Sump Pumps
Converters	NO2 Gas Recycle Pumps	Supply Trucks





Deaerator Packages	Oil/Water Separators	SWS Overhead Accumulator
Deep bed Nutshell Filters	Product Pumps	SWS Pumps
Discharge Coolers	Product Tanks	SWS Reboilers
Dissolved Air Flotation Unit	Quench Tank	SWS Strainers
Drills	Quench Water System	Thickener and Pumps
Equalization Tanks and Pumps	Recirculation Pumps	Utility Vehicles
Filter Press	Refrigeration Units	Vapor Catalytic Combustor
Flare Knock Out Pumps	Regeneration Carbon Storage Tanks	Virgin Carbon Make-up Silo
Flare Packages	Reverse osmosis Unit	Water Heaters
Fuel Trucks	Sanitary Septic System	Water Pumps
Gas Burners	Scot Carbon Filters	Water Storage Tanks
Gas Compressors	Scot Pumps	Water Trucks
Gas Heaters	Scot Reflux Accumulator	Wet Well/Surge Tank
Glycol Chillers	Scot Regenerator	

Prior to site preparation, the boundaries of the 160-acre site lease will be marked. The storm water pond will be constructed, clean water diversion ditches installed, and BMPs will be implemented. Larger trees will be cut and made available for firewood through a commercial operator. Stumps will be disposed of by burning on site (with the appropriate burn permits) or by hauling off site. Stumps may also be buried on site. Remaining vegetation will be cut and chipped with chips left on the ground to be incorporated into the salvaged soil. Approximately 12 inches of soil will be segregated, removed and deposited in three designated soil storage areas (Exhibit J). In areas where 12 inches of soil is not available for salvage, reasonable available soil material will be removed, with a targeted minimum of six inches removed in any location, where available. This material may not all be soil by strict definition, but will support vegetation and hence be suitable for plant growth medium. The soil stockpiles, capable of storing approximately 200,000 cubic yards of material will disturb approximately 10 acres. The piles will be approximately 12 to 15 feet in height. Soil stockpiles will be graded so that out slopes do not exceed 2 Horizontal to 1 Vertical (2H:1V), unless the angle of repose is shallower. The soil stockpiles will be seeded with the BLM approved grass seed mix to minimize erosion and associated loss of soil. Soil stockpiles will also be covered with an erosion control netting to further minimize erosion and promote growth.

### **4.3 In-situ Conversion Process**

Ground freezing as a means of containment was introduced in the 1800s to temporarily strengthen soils and serve as a barrier to ground water flow. Ground freezing continues to be applied in civil and geotechnical engineering to exclude water from areas being excavated; to seal tunnels, mine shafts, or other subsurface structures against flooding from ground water; and to enclose and/or consolidate hazardous or radioactive contaminants during remediation or reclamation operations. The containment system for the OST will consist of a series of drill holes in a close pattern (Exhibit L). Refrigerant will be circulated through the holes in a closed circuit to create a barrier of frozen water in a rock matrix.

The construction of the freeze wall containment area for the OST will allow heating of oil shale to recover products while preventing mixing of products with the ground water system. A freeze wall will be established for the depth of the freeze holes and will encircle the resource target zone creating an enclosed freeze wall containment area. The resource target zone is a carefully selected portion of the oil shale resource. The top and bottom of the resource target zone are low permeability layers that will prevent movement of converted hydrocarbons in a vertical direction. The freeze wall containment area provides lateral containment. The freeze wall will act to prevent liquid movement into or out of the containment area, separating the ground water system from the ICP products. The freeze wall containment area will be maintained and monitored throughout the heating, recovery, and the ground water reclamation phases of the operation. Since the freeze wall will take an extended period of time to thaw, the freeze wall refrigerant circulation may be stopped prior to final flushing if it can be demonstrated that the containment area is sufficiently rinsed and collected rinse water meets appropriate quality.

#### **Freeze Wall Construction**

Upon completion of site preparation, approximately 157 drill holes will be drilled approximately 8 feet apart. The freeze holes will be drilled to a depth of approximately 1,850 feet or the depth of the entire target interval. The configuration of a typical freeze hole is shown on Exhibit N. Both air-mist fluid drilling and aerated fluid drilling methods are under consideration at this time. The air-mist method produces greater volumes of water compared to the aerated fluid method. Drilling methods will be selected based on field conditions and technology. Drilling fluids and additives that may be used are shown in Table 4.2

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**Table 4.2 Inventory of Drilling Fluid Additives for use by Shell and its Contractors****Coring and Drilling Projects**

<b>Foamers</b>
Baroid Quik-Foam
Bachman 485
Weatherford WFT FM A-100
<b>Gels and Polymers</b>
Baroid EZ-Mud - polymer
Halliburton Quik-Gel – bentonite gel
Halliburton Mud-Gel – bentonite gel
Baroid Quik-Trol and Quik-Trol LV - polymer
Benseal– for plugging back holes and hole abandonment
Baroid Holeplug – for plugging back holes and hole abandonment
<b>Thread Compounds</b>
Jet Lube Well Guard
MacDermid – Vinoleo thread compound for fiberglass casing
Best-O-Life Silicone GGT
Best-O-Life 72733 high temperature high pressure thread compound – not used in water wells or monitor holes.
Lub-O-Seal NM-91 anti-seize
<b>Corrosion Inhibitors</b>
Weatherford Corrfoam
<b>Others</b>
Rock Drill Oil R.D.O. ES
Sodium bicarbonate –pH neutralizer
Mazola Corn Oil – to free stuck pipe
Ventura Ultra-Fry (Canola Oil) – to free stuck pipe
Huskey LVI-50 Rod Grease – lubricate drill rods in dry hole

To complete the freeze hole and provide refrigeration for the length of the hole, an interior steel freeze tube will be installed to a depth of approximately 1,850 feet. The bottom of the steel tube will be sealed with an end cap. A smaller diameter high-density polyethylene (HDPE) inner freeze tube will be installed inside of the steel freeze tube. It is expected to take about six months to complete the drilling for the freeze wall pattern.

Once the drilling is completed, a chilled aqua ammonia solution (refrigerant), at an approximate temperature of -45° F is pumped through the holes. The interior HPDE tube will be used to convey the chilled aqua ammonia to the bottom of the hole and the outer steel pipe allows the

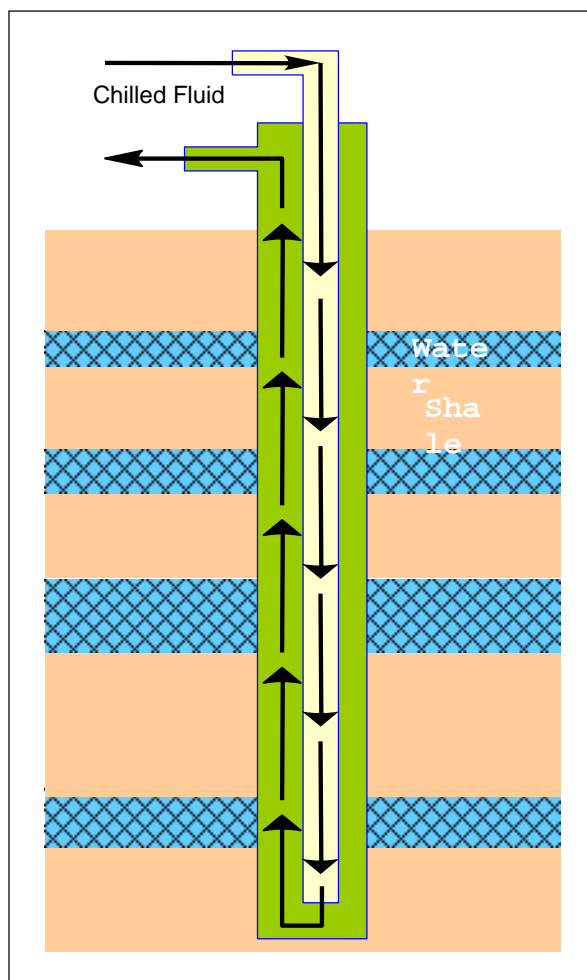
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solution to return to the surface for recycling back to the refrigeration system (see Figure 4.3). The aqua ammonia solution will be circulated at approximately 50 gallons per minute (gpm) per hole.

The area immediately surrounding the holes is frozen first. The frozen area continues to expand as refrigerant is re-circulated down each hole. Eventually the frozen “columns” expand to the point where the approximately concentric frozen “columns” are joined and a freeze wall barrier is created as shown in Figure 4.4.



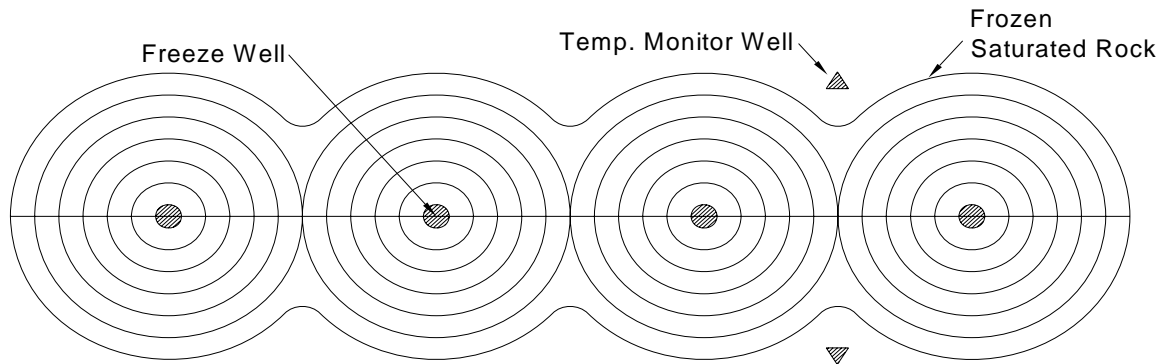
**Figure 4.3 Schematic of Refrigerant Flow**

It is anticipated to take approximately 18 months to establish a continuous freeze wall barrier.

As the circulation of refrigerant continues, the thickness of the freeze wall will continue to grow, although the rate of growth will slow as the wall thickens. Heating in the interior of the containment zone will inhibit inward growth of the freeze wall barrier.

Once the freeze wall is in place, there will be little change in the temperature of the wall throughout the thickness because of the insulating capacity of the rock matrix. In addition, the system can withstand power outages without damaging the integrity of the freeze wall due to the temperature and thickness.





**Figure 4.4 Freeze Well**

The freeze wall containment area will be maintained until it can be demonstrated that the containment system is sufficiently rinsed and collected rinse water meets appropriate quality. The period of time for operation of the freeze wall containment area is currently estimated to be approximately ten to eleven years.

If piping in the freeze hole or above ground develops a leak, it would be detected by pressure and temperature sensors in the closed loop system. Shutoff valves are available at each hole to stop circulation of fluid in the hole. Shutoff valves are also available within the surface system to stop surface flows should a leak be detected. Any aqua ammonia in the down hole piping can be purged using high-pressure nitrogen. Leaks or spills would be piped back into the refrigeration system or hauled off-site. A Process Safety Management Manual for ammonia handling will be developed in accordance with Occupational Safety and Health Administration regulations prior to operation.

### **Refrigeration System**

As the freeze holes are being drilled and completed, the refrigeration system will be constructed. The refrigeration system will be installed before other process equipment due to the length of time required to establish the freeze wall containment barrier. The refrigeration system will be located on the processing level along with the processing facilities as shown on Exhibit J. The plant will contain three (3) refrigeration units, which can each be operated separately. Initial charging of the refrigeration system with anhydrous ammonia and carbon dioxide will occur using the truck loading area closest to the refrigeration system, also on the processing level southwest of the refrigeration units.

The refrigeration units will be constructed on a concrete foundation that is curbed and graded to drain to a series of collection points that convey any spilled materials to a concrete sump. The sump will collect spills which will then be pumped to a truck for transport and disposal off-site. This containment includes operating areas and truck loading and unloading facilities. An expansion tank, an approximately 25,000-gallon tank, will contain aqua ammonia solution during initial cooling and in the event of an extended shutdown in the system. The expansion tank will be located adjacent to the production area.

Appropriate procedures for storage, handling and emergency response for ammonia chemicals used in the refrigeration system will be included in the Process Safety Management Manual to be developed in accordance with Occupational Safety and Health Administration regulations prior to operation. Emergency response procedures including procedures for clean-up of spills and notification requirements will be included in the Emergency Response Plan (ERP) to be developed prior to operations.

Because the refrigeration system is a closed loop system, the system will be designed with temperature and pressure monitors throughout to identify changes that will indicate a potential leak within the system as well as shutoff valves to stop the flow of refrigerant when a problem is detected. The monitoring will include alarms to alert of potential problems. Provisions are made to isolate portions of the system when a problem is detected. Because there are three separate refrigeration units within the refrigeration system, individual units can be isolated and shut down without impacting the entire system.

### **Dewatering Within the Freeze Wall Containment Area**

Once the freeze wall has been established, drilling will occur inside the freeze wall containment area for both producer wells and heater holes. The functions and operations of these are discussed in later sections of this Project Description. Some of the producer holes will initially serve as ground water dewatering holes and their function as dewatering holes is discussed in this section.

There will be approximately ten dewatering holes drilled inside the freeze wall containment area. The dewatering holes will be completed to the total depth of approximately 1,880 feet as shown on Exhibit N. The upper portion of the hole will be cased with and cemented in place. Slotted liner will be placed from just below the bottom of the casing to the bottom of the hole and electrical submersible pumps will be installed.

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Ground water removed from inside the freeze wall containment area prior to heating will be injected into wells located down gradient, and outside the freeze wall. This will be accomplished through an above ground piping network that allows this water to be directed from dewatering holes to injection wells.

Two to four injection wells will be installed outside of the freeze wall as shown on Exhibit J; one upper strata and one lower strata. The dewatering phase is expected to last approximately 4 months, but actual time will be determined by dewatering efficiency. Dewatering pumping rates will be adjusted to match with injection rates.

Once the ability to pump water slows to the point that dewatering is no longer economical or feasible, dewatering operations will cease. During dewatering, the water being re-injected will be monitored periodically for water quality prior to re-injection to ensure that the water is being re-injected into the appropriate strata and that existing water quality is not impacted. Dewatering and re-injection flow rates will also be monitored to allow calculation of the amount of water taken from the containment zone and associated rate of re-injection.

### **Heater System**

Approximately 30 heater holes will be drilled in the interior of the containment zone, spaced approximately 25 feet apart, as shown on Exhibit L. A buffer zone of approximately 125 feet will be established between the freeze holes and the heater holes to minimize the potential for heating of the freeze wall. Electric heaters will be installed in each hole to uniformly heat the oil shale. The approximate surface area of the heated pattern is 130 feet by 100 feet. The heaters are in place and heat the resource target zone for approximately 2 years.

All the heaters will be installed and energized at about the same time. The heaters are operated to achieve heating rates that bring the average reservoir temperature to between 550 and 750°F in approximately two years. The requirements for high operating temperature and long heating duration have resulted in the development of heaters specially designed for the project.

Each heater has a controller and temperature indicator. Some heater holes will be monitored for changes in pressure. The temperature and pressure monitoring will provide operating information and data from this research project that will help in the design of future operations. The heaters are designed to operate for the entire period without requiring maintenance. If heaters fail in service, they may be replaced.

During heating, the heat is transferred in the rock formation by thermal conduction only – no steam or heat transfer fluids are injected into the oil shale. The superposition or overlapping of heat from the array of heaters causes the average resource target zone temperature to rise quite uniformly, except within a few feet of the heater holes. The kerogen closest to the heaters will be converted first with the conversion moving outward as the heating progresses.

Heating also results in expansion of the rock. The rocks have differing thermal conductivities, with the leaner oil shale having greater conductivity than the kerogen-rich oil shale. The design of the heated zone accounts for these conductivities to ensure a sufficient buffer distance to the freeze wall to prevent unacceptable input of heat to the freeze wall. This is a function of the amount of heat put into the system, the conductivity of the rock, the time that the heaters are energized and the distance between the heaters and the freeze wall.

Due to the heating associated with production, heave and subsidence can occur at the surface and compaction can occur within the reservoir. Based upon the small production footprint and the depth of heating, little surface expression of changes within the pyrolyzed zone is anticipated. The surface expressions of heave is expected to be approximately 1.0-1.5 inch and the surface expression of subsidence is expected to be approximately 0.5 – 1.0 inch.

### **Product Recovery**

As heating occurs, the lighter and higher quality vaporized ICP products, plus steam and non-condensable gases, will flow to the producer holes. Because of the slow heating rate, and the close spacing between holes, the initial reservoir permeability required for fluid transport can be relatively low. There is no need to create permeability by hydraulic or explosive fracturing. The producer wells will collect the converted kerogen products (oil and gas mixed with some water) in the pyrolyzed zone and convey those products to the surface for transport to the processing facilities. Both traditional and experimental lift systems will be used in the producer holes to “lift” the product to the surface.

Ten producer wells will collect the gas and oil produced by the ICP. The locations of the producer wells are shown on Exhibit L. Initially the producer wells will be used to dewater the freeze wall containment area. Upon completion of dewatering, pumps are removed and the holes plugged to the top of the R-4. When production commences, these holes will be used as producer holes. The producer holes are completed to a depth of approximately 1,675 feet. Pumps will be installed in each hole to bring the product to the surface.

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Each producer hole will be equipped with instrumentation to monitor production and reservoir condition, performance, temperature, rates, and pressure as part of the ongoing research efforts at OST.

A pump with lift assist is used to bring the liquids to the surface. Such lift systems are used on conventional oil and gas production. Standard oil and gas production lift systems, as well as some experimental lift systems, will be used. This will enable operating personnel to determine the best system for use in future operations.

At the start of the heating cycle, cutter stock (purchased diesel or jet fuel) is injected into the inlet of the down-hole production pumps to prevent plugging from bitumen which is produced when the pyrolyzed zone is relatively cool. The cutter stock may also be circulated in the above ground field collection piping to prevent plugging. Both the cutter stock and the treated gas used in the chamber lift system will be recovered and treated in the processing system.

In general, the down hole heating process will be sufficient for release of the hydrocarbons from the kerogen, and movement toward the producer holes. At later stages of production, the hydrocarbons released from the kerogen may be removed with the assistance of water injection holes. These water injection holes will be located inside the freeze wall containment area, but outside the heated pattern. These holes will be used to inject water into the pyrolyzed zone. The intent is to assist in collecting and pumping fluid from the producer holes, while protecting the freeze wall. The recovered fluid (a mixture of water and hydrocarbons) will be collected for further processing.

The temperature of product from the producer holes will be approximately 400 °F. The product is quenched to cool the material for transport to the processing facility. Quench water brought to the well head is mixed with the heated product coming from the producer hole. This results in a mixture of water and hydrocarbon. The mixture is piped to the processing facility at about 250°F.

Oil and gas production is approximately 600 barrels of oil or 1,000 barrels of oil equivalent (oil and gas) per day at full production for the OST.

When production is completed, producer holes will revert back to water collection holes during the cooling and water reclamation phase of the project. The collection system will be used to capture and transport water to the water reclamation plant.

### Field Collection Network

The field collection network will consist of headers and piping to collect oil and gas from the producer holes for transport to the processing facility. Figure 4.5 is a photograph of a typical production field piping network. The piping network at the OST site is expected to look similar to that shown in this photograph. Power is distributed throughout the surface of the production zone.



**Figure 4.5 Photograph of Field Piping Network**

The above ground collection system will operate under a nominal pressure of 60 psi. Pressure is monitored with instrumentation throughout the system, with readouts in the process control room. Visual inspections of the above ground piping network will be made on a regular basis. If there is a drop in pressure in the collection system indicative of a potential leak or break, that portion of the system can be shutoff until repairs are made. Surges in pressure will be relieved by a pressure release valve. Appropriate procedures for storage, handling and emergency response for the product recovery system will be included in Materials Handling and Waste Management Plan or the ERP to be developed for the site.

### Processing System

The recovered product will include a mixture of liquid hydrocarbons, gas, and water that will be processed further to remove impurities and ready the products for transport off site or reuse in the recovery process. The recovery process is a typical process used in the oil and gas industry. The processing system location is shown on Exhibit J with a more detailed, process block flow diagram shown on Figure 4.6.

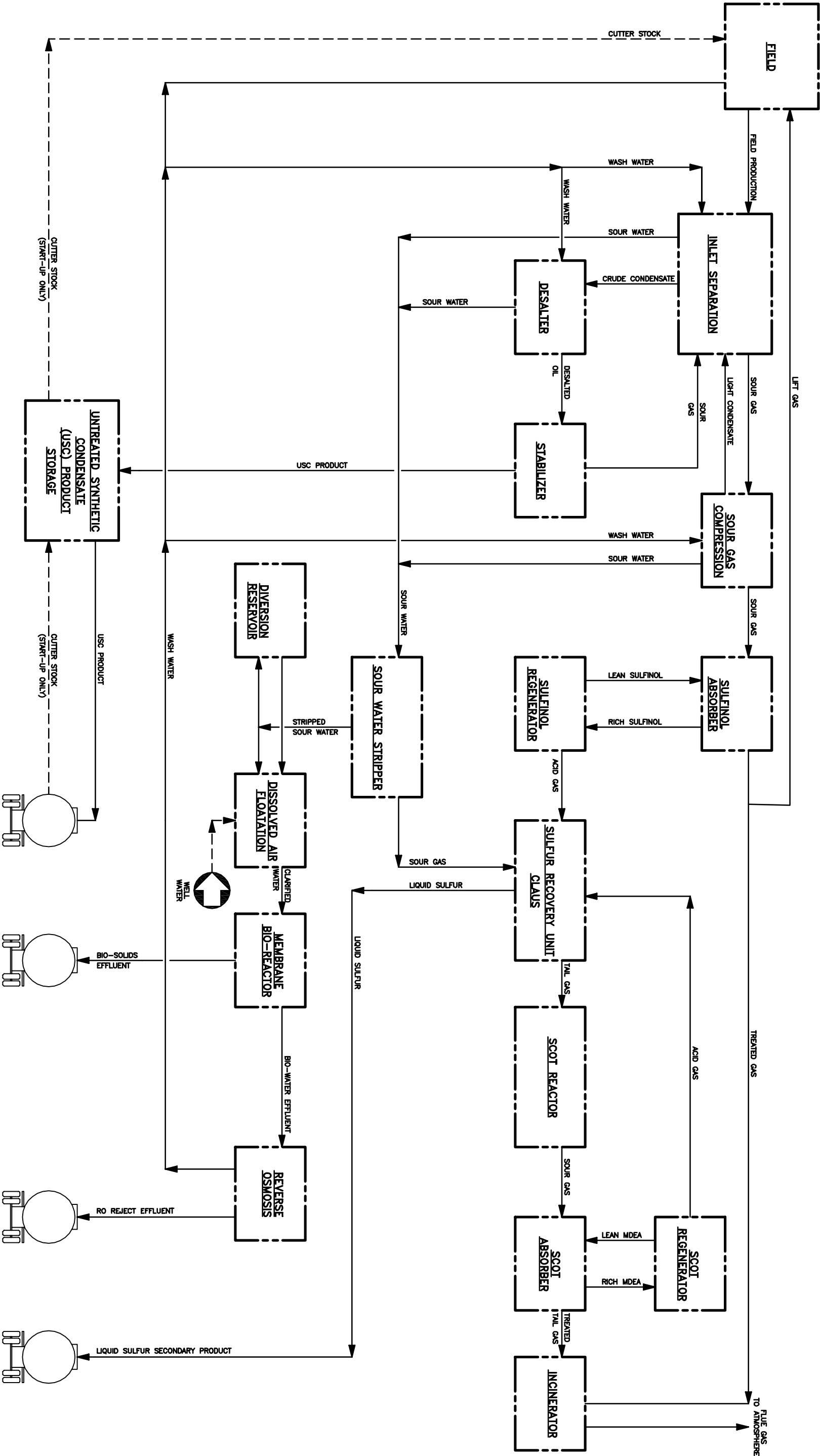
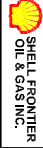


FIGURE 4.6

PROCESSING BLOCK FLOW  
DIAGRAM  
OST

Drawn By: K/V	Date: 12/15/05 NW
Approved By:	Date:



The initial processing will separate the recovered product into three streams: liquid hydrocarbons, sour gas, and sour water. The term sour refers to the presence of sulfur compounds and carbon dioxide. Once the three streams have been separated, each stream is further processed to remove impurities. Except as noted in the following discussions, the waste streams generated during much of the processing are recycled back into the processing for further treating.

### Liquid Hydrocarbons

The liquid hydrocarbons go through a two-step process to remove additional water and gas and create the liquid hydrocarbon product. The first step in the process involves removal of salt in the hydrocarbons through a desalting process. The hydrocarbon product is mixed with water and the salt is dissolved. The oil and water mixture is then separated using large electro-charged plates. The salty water is pulled to the bottom and the cleaned oil floats on top. The salty water is then sent for water treatment along with the sour water and the oil moves on to the next step.

The second step involves stabilizing the hydrocarbon product for transport through a distillation process. The distillation process separates the lighter gaseous and water fractions from the heavier liquid fractions and lowers the vapor pressure in the heavier fractions to that allowed for storage and transport. The liquid and gaseous streams are returned to the processing system for further processing.

The liquid hydrocarbon product is then sent to storage tanks. The product, known as Untreated Synthetic Condensate (USC) will be stored in two tanks located as shown on Exhibit J prior to transport off site. The facility is expected to produce approximately 600 barrels of oil per day at full production. The two USC tanks will each have a capacity of 139,000 gallons and will be designed with floating roofs. The tanks will be located within a containment area with curbing to contain any spills. Any spills will be collected and sent back to the processing system.

One or both USC tanks will initially be used to store cutter stock prior to product recovery and processing. Once the cutter stock has been introduced into the system, the tanks will be used for product storage. No clean-out will be required prior to the change in use.

Approximately five truckloads of USC will be shipped per day at full production. The tank loading area is a concrete area with curbed containment. Any spills will be collected and sent back to the processing system. The truck loading area will be equipped with heat sensors that control a foam system for fire suppression, if needed.

## Gas Stream

The gas stream separated from the hydrocarbon product is treated through a multi-step process to remove sulfur and any remaining hydrocarbons and water. Hydrocarbons and water removed during the gas stream processing are returned to the hydrocarbon or sour water processing streams.

The gas is first compressed and cooled. Any condensed sour water and hydrocarbons are collected and sent back for further processing. The gas is then passed through columns and contacted with an amine-based solution that will absorb organic sulfur compounds, carbon dioxide, and acids. The treated gas collected after passing through the columns is then sent to the chamber lift system for use in product recovery, or used to supplement site fuel needs, or is incinerated. The solution is further processed to remove the high sulfur content gas and carbon dioxide and is then recycled back for reuse. The acid gas from the solution is sent to a conventional Claus sulfur recovery unit where it is converted to liquid sulfur. Gas which does not get converted to liquid sulfur in the sulfur recovery unit undergoes further treatment in a conventional SCOT (Shell Claus Offgas Treating) unit to remove the bulk of the remaining sulfur compounds. Methyl diethanolamine (MDEA) is used to strip the organic sulfur in this processing segment and then the MDEA is regenerated for reuse.

The sour gas processing employs the use of Sulfinol M, a proprietary solution containing MDEA, Sulfolane, and water. The MDEA and Sulfolane will be stored in tanks located within the processing system area (see Exhibit J for the processing area location). The Sulfolane and MDEA will be trucked to the site and unloaded into the tanks. Both the Sulfolane and MDEA are recycled for reuse in the process so large quantities are not required to be shipped to the site on a regular basis.

The gas processing results in products that include treated gas and liquid sulfur. The liquid sulfur will be stored in an enclosed concrete vault. The concrete vault will include steam coils in the bottom to maintain the sulfur as a liquid until shipped offsite. An estimated maximum of eight truckloads of liquid sulfur are shipped per month during the full production period. The tanker will be loaded in a curbed, concrete loadout area adjacent to the processing facility and concrete vault. Any spills will be collected and returned to the processing facility.

The treated gas will be incinerated on site, or used to supplement natural gas requirements used in processing. An incinerator was chosen to control the burn temperature to reduce the carbon monoxide and NO<sub>x</sub> emissions. The incinerator operates at a temperature of approximately 1500° F. The exhaust gas from the incinerator is composed mainly of nitrogen, carbon dioxide, and

water vapor. It also contains smaller amounts of nitrogen oxides, sulfur oxides, and carbon monoxide. A permit will be obtained from the Colorado Air Pollution Control Division for the incinerator exhaust gas.

As in other conventional treatment facilities for oil and gas, over pressure protection systems are provided as a safety feature. These safety systems provide pressure relief through a piping system that terminates at a lighted flare. The flare combusts any hydrocarbon in the relief stream to prevent the undesirable accumulation of combustible vapor. The flare location is shown on Exhibit J. The flare will not be routinely used, but is for emergency pressure release.

### Water Stream

The sour water stream is run through a multi-step process to improve the water quality for reuse or discharge. The first step is a distillation process that removes ammonia, hydrogen sulfide gas, and light hydrocarbons. The vapor is sent for further treating in the gas stream segment of the processing system. The water is sent to a flotation cell and compressed air is used to generate gas bubbles that carry hydrocarbons and solids to the surface of the water in a froth layer that is then skimmed off. The froth layer is stored in a tank for eventual shipment from the site. The water continues to the next step of processing which is the membrane bio-reactor. The membrane bio-reactor uses bacteria, protozoa, and rotifers to remove organic material and convert this matter to biomass and other byproducts such as carbon dioxide, nitrogen gas and sulfates. Excess biosolids are collected and stored in a 214,000 gallon tank for shipment offsite. The water then goes through a reverse osmosis process to remove dissolved salts and other ions. Reject water from the reverse osmosis is directed into an 189,000 gallon tank for storage and transport offsite. Clean water is recycled back for use in the as quench water or in the processing facility.

The only additions for the water processing are compressed air and the bacteria, protozoa and rotifers. Tanks for storage of waste streams from the water treatment (air flotation solids, excess biosolids, and reject water from the reverse osmosis) will be located within concrete lined and curbed containment. The loadout area will be located north of the storm water pond as shown on Exhibit J and will also be a concrete lined and contained area. Any spilled materials will be sent back to one of these storage tanks.

The purified water stream is recycled for use as boiler feed water, washes for condenser units and as temperature regulating quench water. Any water not needed for the project will be discharged to the Yellow Creek drainage following treatment to the applicable standards. A Colorado Discharge Permit System permit will be obtained from the Colorado Water Quality Control Division for this discharge.



### **Processing System Pilot Scale Test Skids**

Small “slipstream” volumes of gas, oil, and sour water will be processed in pilot scale test facilities located on skids to provide easy movement. These small plants will be used to conduct testing and collect data on USC processing methods. The pilot scale tests will be conducted within the process facilities area. Pilot scale testing will be used to evaluate the potential for additional processes to assist in further refining the products from the ICP process. Wastes from the pilot scale facilities will be handled in the process water treatment plant or the gas cleaning systems. Spills will be captured and treated in the process water treatment plant.

### **Process Water Pond**

The Process Water Pond is a lined pond that is used as storage capacity for the stripped sour water from the Sour Water Stripper. This pond will be used to provide extra storage and in the event that the Dissolved Air Flootation, Membrane Bio-Reactor, or the Reverse Osmosis Units are off line for maintenance or repair or during periods when additional storage is needed. The stripped sour water can be diverted and stored in the Process Water Pond until the water treatment units are functional again. It is expected that the pond will be used for storage on a routine basis and will not remain empty for long periods of time.

The process water treatment pond has a capacity of approximately 10 acre-feet. Because the pond will hold process water that has not been fully treated to meet discharge standards, it is designed with a triple liner system composed of a soil liner overlain by two synthetic liners with a leak detection layer between. The soil liner is a geosynthetic clay liner (GCL) mat overlain on a six inch prepared subgrade. A 60-mil smooth HDPE liner will be placed over the GCL. The primary liner is an 80-mil HDPE liner, textured on the side slopes and smooth on the bottom. Geo-net with a leachate collection and recovery system will be placed between the two liners. The pond does not have an outfall structure as it is a total containment pond.

The process water pond will be fenced with an eight-foot high chain link fence to prevent wildlife from entering the pond and causing liner damage.

## **4.4 Recovery Efficiency and Energy Balance**

Although Shell’s economic model contains many inputs, ICP economics depends heavily on the following three subsurface process performance metrics:

- Recovery Efficiency – the ratio of produced ICP oil to Fischer-assay oil in place
- Energy Balance – the ratio BTU's out as oil and gas to the BTU's input via electrical power
- Product Quality – the composition and properties of produced ICP fluids (e.g. API gravity)  
Product quality is addressed further in Section 4.7 below.

The high recovery efficiency of ICP (~100% of Fischer assay BOE, Barrel of Oil Equivalent) results from the slow, uniform heating process and also from the in situ vaporization of the hydrocarbons.

ICP makes more complete use of the oil shale resource. The entire oil shale column is pyrolyzed, including lower grade zones that could not be mined economically for surface retorting. ICP also can access deeper oil shale resources than are uneconomical to mine. Overall, much more oil and gas may be recovered from a given area utilizing the ICP process.

There are locations of thick resources in the Piceance Basin that could yield in excess of one million barrels of shale oil per acre.

ICP requires energy input for heating, freeze wall construction, processing, and maintenance but still generates three to four times as much net energy as it consumes. This energy ratio is very comparable to steam injection in heavy oil projects.

### **Support Facilities**

Support facilities associated with the ICP and processing facilities include the building complex near the project entrance, the utility building and substations, a process control and locker/change house building, loading / unloading facilities, construction support, and driller support. Sanitary wastes from these facilities will be piped to the process water treatment building and treated in the Bio-Reactor. Solid waste (trash) will be disposed off site at an approved facility.

Security will be provided at the site. Trucks, visitors and employees will be required to enter through the security gate to access the work site. The maximum number of people employed at the site will occur during construction and drilling. An estimated maximum of approximately 720 individuals will be employed at the site during the construction and drilling period. Once construction is completed, the maximum expected employment at the site will be approximately 155. Shifts will typically be nine-hours per day, with some operators working twelve hour shifts.



Parking will be available in a parking lot just inside the main gate. An automated exit gate will be installed. Traffic will range from 300 to 650 vehicles per day, including personal automobiles and supply and product trucks.

Emergency Response personnel will be on site or on call. Written emergency procedures will be kept in manuals developed in accordance with Occupational Safety and Health Administration regulations prior to operation and in the Spill Prevention Control and Countermeasures (SPCC) and ERP. Copies of these manuals will be located in the control room and guard shack. Employee training will include safety, chemical handling, spill control and cleanup, and other emergency procedures.

### **Building Complex**

The building complex includes a guard shack and gate, warehouse, shop building, laboratory building, and potable water tank and delivery system (see Exhibit J). The warehousing and maintenance shop will provide routine services for the operation.

Spill containment and cleanup procedures developed as part of the SPCC and the ERP will be implemented for any regulated chemicals used or stored in these facilities.

The laboratory will be used for process quality control testing, research testing and environmental monitoring. The building will be on a concrete foundation with a sump for spill containment. Chemicals will be stored in cabinets, appropriately segregated. Liquid waste from the laboratory will be treated at the process treatment plant or collected for off-site disposal in accordance with applicable regulations.

Potable water will be stored in a 12,500 gal tank at the building complex. Potable water will be brought from off site. The potable water system will service the lab, warehouse, shop, control room, and change house.

### **Utilities**

Power is brought into the site from an electrical substation constructed, owned, and operated by White River Electric Association (WREA), just outside the permit boundary. Two substations on the project site will be maintained on site for power distribution to the project. It is anticipated that WREA will obtain the permits necessary for the substation and distribution line, an approximate location is shown on Exhibit C.

An electrical sub yard for heaters is located adjacent to the freeze wall containment area to support the heating process. An additional electrical sub yard is located just east of the WREA substation and services the rest of the facilities. Natural gas is brought on site via a pipeline from a commercial supplier located in proximity to the site and distributed to the processing facility. A stand-by diesel generator is located in the utility building. A small diesel storage tank will be located inside the curbed building to provide fuel for the stand-by generator.

The utility building area is also the location for the compressed air and nitrogen storage and distribution. Liquid nitrogen will be brought to the utility building in tank trucks. A paved unloading facility will be used. The liquid nitrogen is pumped into a 1,500-gallon nitrogen storage tank with a pressure release valve to atmosphere. The liquid nitrogen is vaporized for use in the process, including uses as blanket gas in process storage tanks and in the aqua ammonia expansion tanks. High pressure nitrogen is also brought to the site. The nitrogen will be brought to the site via a tube trailer and will be used to supply the refrigeration system with utility nitrogen, in the producer holes and gathering area as purge gas, and for instrument air.

Chemicals used in the processes are stored and handled within secondary containment and are subject to the ERP to be developed prior to initiation of refrigeration.

### **Process Control and Change House**

The process control building and a change house are located near the utility building. The process control building will include data loggers from the many process sensors located throughout the project. The change house will be supplied with potable water. Sanitary waste from both buildings will be treated at the bioreactor at the process water treatment plant.

### **Drillers Support**

Drilling of holes within the freeze wall containment area will last approximately one year. During that time, there will be a designated area for location of drilling support. Drilling support will include separate office, warehousing and operating equipment. Trailers for use as office and changing rooms will be located at the southwest end of the disturbed area as shown on Exhibit J. A material storage yard will be adjacent to the trailers. Diesel fuel, piping, and supplies will be located in the material storage yard.

Air compressors, mud traps and mud pumps will be located adjacent to the active drilling during the drilling program. Drill cuttings removed from the drilled holes will be dewatered so the water can be recycled back to the drill rigs. The dewatered cuttings will be placed into a cutting pit as shown on Exhibit J. This pit will be approximately 100 feet by 300 feet. The drill cuttings are not

toxic or acid forming as shown by results of Meteoric Water Mobility Testing performed on cutting samples.

#### **4.5 Water Management**

Water requirements vary throughout the project life. Water uses include construction, potable water, dust control, drilling, processing, filling and cooling of the heated interval for reclamation, and rinsing of the zone inside the freeze wall.

##### **Water Supply and Water Requirements**

Water will be trucked to the site for construction and drilling activities. Potable water will be trucked to the site throughout the life of the facilities.

Onsite water will be used for most operational uses and will be supplied from water wells drilled for that purpose. A primary and a backup water supply well are planned. The well will supply water needed for processing and reclamation. Peak pumping demand from the well is estimated to be approximately 300 gpm and will occur during the fill and cool phase of the reclamation cycle (see Section 5.0). If the water well is available during construction and drilling, then this water will supplement or replace construction and drilling water trucked to the site.

Water needs for each phase of the operation are outlined below. The projected water needs are estimates and are subject to change as additional information becomes available and facility designs are finalized. Water rights required for the project will be acquired prior to startup of the operation.

##### **Construction Water**

Construction water will be trucked to the site as necessary for use in compaction, dust control and miscellaneous construction water needs. Construction water needs are estimated at approximately six gpm. Potable water needs during construction will be through provision of bottled water brought to the site.

##### **Drilling Water**

Water required for drilling will be trucked to the site until water from the on site water supply well is available to supplement or replace trucked water. Water needed for drilling operations is estimated at approximately five gpm.



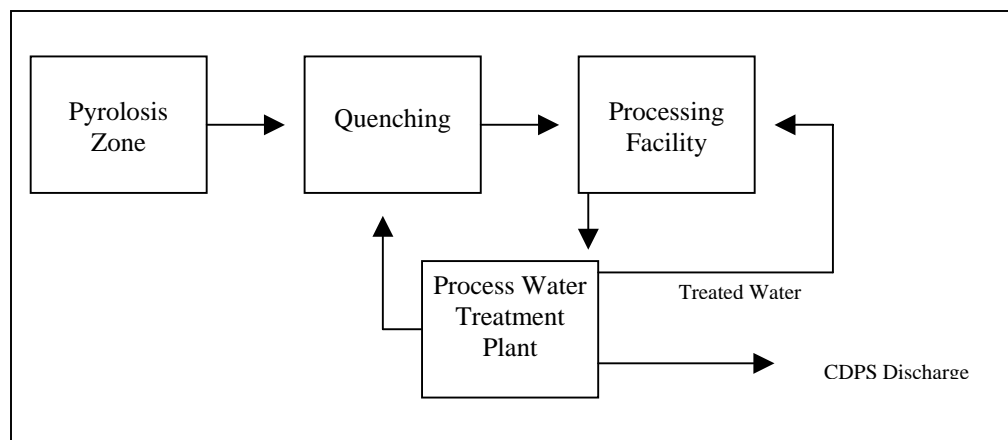
## Potable Water

Potable water will be delivered to the site by truck for use in the potable water system. The system will consist of a potable water tank and distribution lines to points of use. Potable water needs are estimated to be less than one gpm.

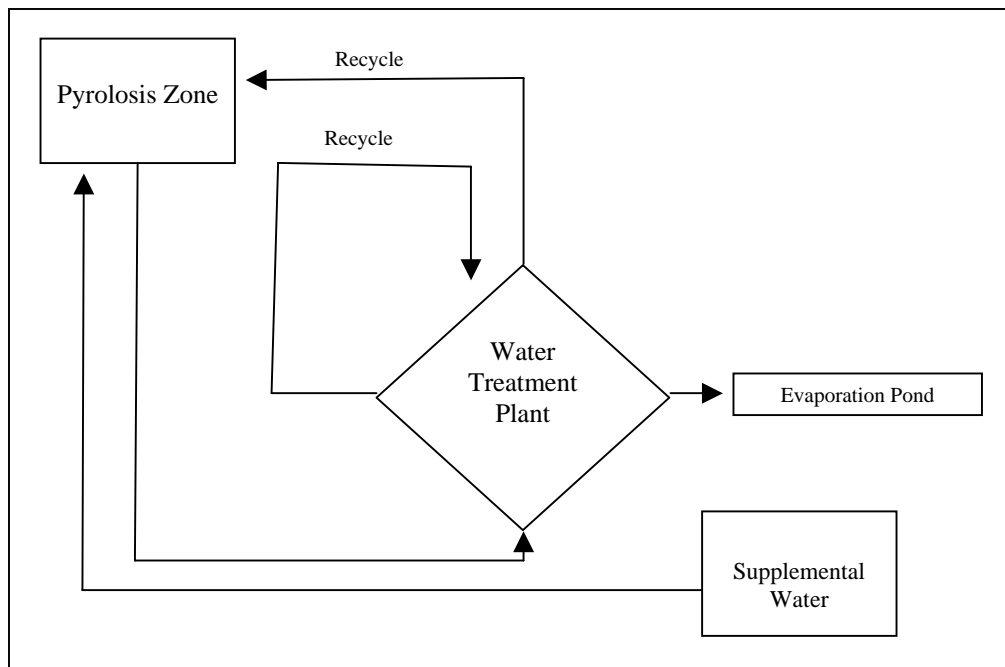
## Operations and Reclamation Water

Water will be needed for various processing and operating needs. Water removed with the hydrocarbon products will be treated in the processing facilities and recycled or discharged. Figure 4.7 provides a general schematic of the process water management. It is currently anticipated that there will be excess water available during the initial processing period as a result of water within in the freeze wall containment area and that there will be no need for the water supply well to provide water for processing during this initial period. As processing progresses, there will be a need for up to approximately 11 gpm for water in processing.

Water is also needed to conduct reclamation filling and cooling of the heated interval within the freeze wall containment barrier as well as rinsing of the heated interval. This water will be a combination of recycle water and make up water from the water supply well as needed. During reclamation up to an approximately 300 gpm will be needed for initial stages of flushing and cooling. Figure 4.8 provides a general schematic of the reclamation water management.



**Figure 4.7 Processing Water Management**



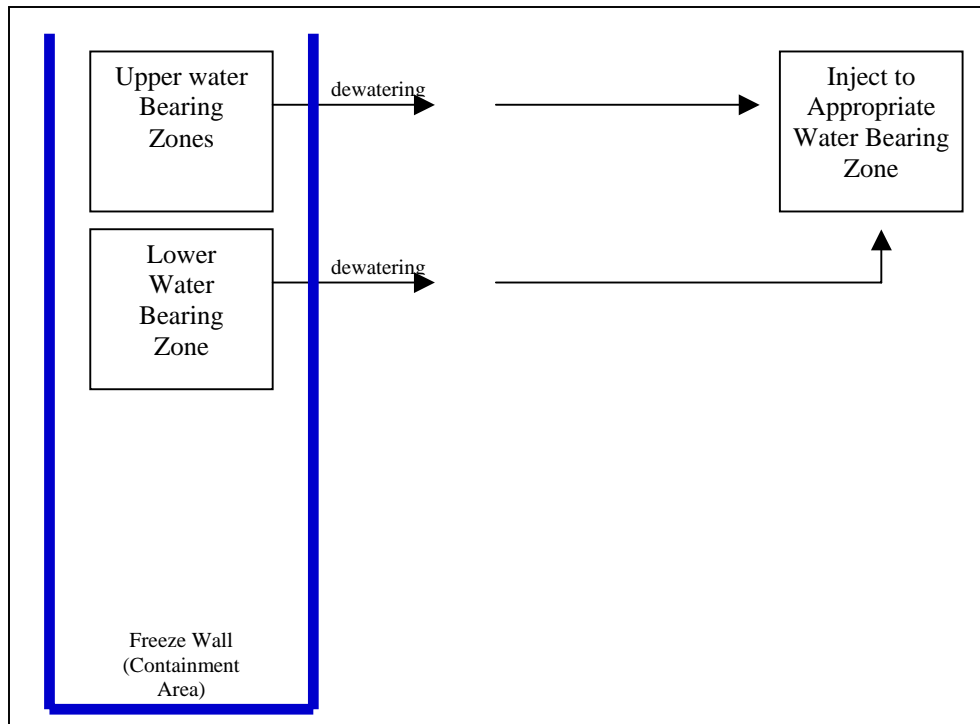
**Figure 4.8 Reclamation Water**

### **Water Discharge**

Water that cannot be recycled or otherwise used will be treated to appropriate discharge standards in the process water treatment plant and released to a surface drainage under a Colorado Department of Public Health and Environment Colorado Discharge Permit.

### **Water Injection**

Once the freeze wall is formed the containment area interior to the freeze wall will be dewatered by pumping. This intercepted natural ground water will be pumped from the freeze wall containment area and injected down gradient of the freeze wall through injection wells. The injection wells will be permitted with the EPA Underground Injection Control program for Class V injection wells authorized by rule. Water of appropriate quality will be injected into appropriate zones so that beneficial use classifications are maintained. Figure 4.9 shows a typical schematic for water management during dewatering and injection.



**Figure 4.9 Dewatering and Injection Water Management**

#### **4.6 By-products and Wastes**

During the course of the R&D project, construction and operation, a variety of by-products and waste materials will be generated. They include construction waste, drill hole cuttings, garbage and miscellaneous solid wastes and sanitary waste.

Surface construction operations will result in a variety of small waste products that could include paper, wood, scrap metal, refuse, garbage, etc. These materials will be collected in appropriate containers and recycled or disposed off site in accordance with applicable regulations

Approximately 200,000 cubic feet of earth and rock materials will be generated during drilling operations for the project. These non-toxic, non-acid forming drill cuttings will be separated from free water and will be buried below grade. Burial depth and soil coverage will be sufficient such that the materials will not impede revegetation.

During operation, garbage from the site will be collected in appropriate containers and disposed off site. Waste oils, reagents, lab chemicals that are not collected sumps and treated at the water treatment plants will be recycled or disposed off site in accordance with applicable regulations.

### **Sanitary Waste**

A combination of sanitary waste handling methods will be employed. Some sanitary waste, such as that collected in temporary toilet facilities may be shipped to an approved facility for offsite treating and disposal. Any gray water or black water disposed onsite will be treated in an appropriate sewage processing unit or disposed according to standards via an approved septic system with clarifier and drain field.

### **4.7 Monitoring and Response**

The OST project is a research, development, and demonstration program designed to demonstrate the ICP, gather additional operating data and information, and allow testing of components and systems. As a result, monitoring is inherent in the design of the project. ICP process monitoring will be designed to gather data on the functioning of the various system components. Shell will conduct extensive compliance monitoring as part of permit requirements e.g. air, water and mining permits. These will be defined as part of the permitting process.

Environmental monitoring that will be done to demonstrate other environmental protection measures for the site are described in this section.

### **Surface Water Monitoring**

A proposed quarterly surface water sampling program will be performed on sampling sites identified in Table 4.3. The locations for these sites are shown in Exhibit O. The sampling parameters are detailed in Table 4.4. All monitoring records will be maintained at the project site.

**Table 4.3 OST Surface Water Monitoring Locations**

<b>Stream Sites</b>	Upstream	Corral Gulch	CR242
	Downstream	Corral Gulch	CR408
	Upstream	Stake Springs Draw	CR407
	Downstream	Stake Springs Draw	CR411
	Downstream	Yellow Creek	CR255



**Table 4.4 Surface Water Sampling Parameters**

Parameter	Unit	Parameter	Unit
Discharge	gpm	Boron, dissolved	mg/L
Field pH	SU	Cadmium, dissolved	mg/L
Field Conductivity	umhos/cm	Chromium dissolved	mg/L
Field Temperature	°C	Chromium, Trivalent Dissolved	mg/L
Field Dissolved Oxygen	mg/L	Chromium, Total	mg/L
Field Turbulence	ntu	Copper, dissolved	mg/L
Residue, Filterable (TDS)	mg/L	Iron, total recoverable	mg/L
Calcium, dissolved	mg/L	Lead, dissolved	mg/L
Magnesium, dissolved	mg/L	Manganese, dissolved	mg/L
Sodium, dissolved	mg/L	Mercury, total	mg/L
Hardness as CaCO <sub>3</sub>	mg/L CaCO <sub>3</sub>	Nickel, dissolved	mg/L
Bicarbonate as CaCO <sub>3</sub>	mg/L	Selenium, dissolved	mg/L
Chloride	mg/L	Silver, dissolved	mg/L
Sulfate	mg/L	Zinc, dissolved	mg/L
Sulfide as S	mg/L	Benzene	ug/L
Nitrogen, Ammonia	mg/L	Toluene	ug/L
Nitrate/Nitrite as N	mg/L	Ethylbenzene	ug/L
Arsenic, dissolved	mg/L	Xylene	ug/L

**Ground Water Monitoring**

Ground water monitoring will be conducted outside of the freeze wall barrier to monitor ground water quality during operation and after reclamation.

Ground water monitoring will consist of monitoring of the water bearing units including the Uinta, A and B Groove, L5, L4 and L3. Compliance monitoring of these zones will occur using dedicated single completions in each zone.

Multiple zone completions are being tested for some wells interior to the freeze wall containment at FWT. Multiple completion wells are equipped with isolation packers to prevent crossflow between zones. Sample ports in the tubing string will allow for collection of pressure data and





water samples. Should the information gained from the multiple zone completion wells demonstrate this type of completion is appropriate for ground water quality monitoring, then multiple zone completions could be proposed for ground water monitoring at a later date, subject to approval.

Planned ground water monitoring for the OST will include one upgradient completion in each unit and downgradient completions in each unit. Additional wells may be installed within the project area for early detection of potential problems.

### **Facilities Monitoring**

Routine visual inspections and operational warning systems will facilitate monitoring of containment systems and features at the OST site. These will include the following:

- Piping systems will be pressured tested prior to use. The pipe systems will have pressure monitors to alert operators when a loss of pressure occurs that could be indicative of a potential problem.
- Sumps within concrete containment areas will be visually monitored on a daily basis and any liquids present in these sumps would be pumped to the process water treatment plant or sent off site for disposal at an appropriate facility.
- Storm water management systems would be inspected on a periodic basis as prescribed in the Storm Water Management Plan.
- A SPCC will be developed to address spill prevention and response for petroleum products at the site. The SPCC plan will prescribe inspection types and frequencies for petroleum related vessels and containments.

In addition, an ERP will be developed for responding to emergencies at the site while ensuring worker safety. The Plan will include designation of responsible personnel, an outline of procedures to be followed, a list of chemicals to be used or stored on site, a list of materials available to control spills or leaks, and notification requirements.

